

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES M. BAKER, On behalf of himself and all
others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

Case No. 1:05-cv-00272-GMS

CLASS ACTION

ROCHELLE PHILLIPS, On behalf of herself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS, and
KENNETH . VECCHIONE,

Defendants.

Case No. 1:05-cv-00277-GMS

CLASS ACTION

(Additional Captions Set Forth Below)

**DECLARATION OF RALPH SIANNI IN SUPPORT OF THE MOTION OF ACTIVIST
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL
OF ITS SELECTION OF LEAD COUNSEL**

ROBERT WILKINS, Individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

Case No. 1:05-cv-00287-GMS

CLASS ACTION

LEONARD BRONSTEIN, On behalf of himself
and all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

Case No. 1:05-cv-00289-GMS

CLASS ACTION

GREG PENN, On behalf of himself and all others
similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, and LANCE L. WEAVER,

Defendants.

Case No. 1:05-cv-00293-GMS

CLASS ACTION

CLIFFORD W. JONES, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS, and
KENNETH A. VECCHIONE,

Defendants.

Case No. 1:05-cv-00316-GMS

CLASS ACTION

MICHAEL D. BLUM, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, JOHN R.
COCRAN, III, RICHARD K. STRUTHERS, and
LANCE L. WEAVER,

Defendants.

Case No. 1:05-cv-00372-GMS

CLASS ACTION

THOMAS J. CUSSEN, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER and JOHN W. SCHEFLEN,

Defendants.

Case No. 1:05-cv-00389-GMS

CLASS ACTION

RALPH SIANNI, of full age, hereby declares under penalties of perjury:

1. I am associated with the law firm of Milberg Weiss Bershad & Schulman LLP. I submit this Declaration in Support of the Motion of Activest for Consolidation, Appointment as Lead Plaintiff, and Approval of Its Selection Of Lead Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the PSLRA notice published by counsel for plaintiff in the first-filed action on *Business Wire* on May 5, 2005.

3. Attached hereto as Exhibit B is a true and accurate copy of the PSLRA certification of Activest.

4. Attached hereto as Exhibit C is a chart analyzing Activest's financial interest in the litigation.

5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss Bershad & Schulman LLP.

Dated: July 5, 2005

/s/ Ralph Sianni

Ralph Sianni